

engaging in sexually explicit conduct and such visual depictions were of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT TWO

(18 U.S.C. § 2252(a)(4)(B))

(Possession of Material Involving the Sexual Exploitation of Children)

On or about March 6, 2015, in the Western District of Texas, Defendant,

ERIC FLORES,

knowingly possessed matter containing one or more visual depictions involving the use of a person under the age of eighteen (18), engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), which visual depictions had been transported in interstate and foreign commerce, to wit: by computer, and were produced using materials which had been shipped and transported in interstate and foreign commerce by any means, including by computer, and the producing of which involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, in violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

(18 U.S.C. § 2253)

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to the Defendant,

ERIC FLORES,

of its intent to seek forfeiture, pursuant to Title 18, United States Code, Section 2253, of all right, title and interest of the defendant in any and all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, or 2252, and any and all books, magazines, periodicals, films, videotapes, and other matters which contain any such visual depiction, which were

produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, Part I, United States Code; any property, real and personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real and personal, used or intended to be used to commit or to promote the commission of such offenses, and any property traceable to such property.

ORIGINAL SIGNATURE
A TRUE BILL
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

GRAND JURY FOREPERSON

RICHARD L. DURBIN, JR.
ACTING UNITED STATES ATTORNEY

By


Assistant United States Attorney